

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<i>In re Terrorist Attacks on September 11, 2001</i>	03 MDL 1570 (GBD) (SN) ECF Case
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*This document relates to: All Actions*

**DECLARATION OF J. SCOTT TARBUTTON TRANSMITTING DOCUMENTS IN  
SUPPORT OF PLAINTIFFS' MEMORANDUM OF LAW IN SUPPORT OF THE  
MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS FROM  
DEFENDANT AL RAJHI BANK**

I, J. Scott Tarbutton, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury, that the following is true and correct to the best of my knowledge and belief:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, and a member of the law firm Cozen O'Connor. I submit this Declaration to transmit to the Court the following documents submitted in support of Plaintiffs' Memorandum of Law in Support of the Motion to Compel the Production of Documents from Defendant Al Rajhi Bank.

2. Attached hereto as Exhibit A is a true and correct copy of Plaintiffs' First Set of Consolidated Jurisdictional Requests for Production of Documents Directed to Al Rajhi Bank, dated May 11, 2021.

3. Attached hereto as Exhibit B is a true and correct copy of a discovery relevance chart listing each of Plaintiffs' document requests and corresponding allegations in Plaintiffs' First Amended Complaint.

4. Attached hereto as Exhibit C is a true and correct copy of Al Rajhi Bank's Responses and Objections to Plaintiffs' First Set of Consolidated Jurisdictional Requests for Production of Documents Directed to Al Rajhi Bank, dated June 10, 2021.

5. Attached hereto as Exhibit D is a true and correct copy of AT&T's February 3, 2020 response to Plaintiffs' January 7, 2020 subpoena directed to AT&T Global Legal Demand Center seeking telephone records.

6. Attached hereto as Exhibit E is a true and correct copy of NL0018775, produced by defendant Jamal Barzinji in September 2011.

7. Attached hereto as Exhibit F is a true and correct copy of a partially declassified version of Part Four of the 2002 Report of the Congressional Joint Inquiry Into Intelligence Community Activities Before and After the Terrorist Attacks of September 11, 2001, commonly described as the so-called "28 Pages."

Executed in Philadelphia, PA on July 30, 2021.



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J. Scott Tarbutton, Esq.

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